



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MAGDA EISENBERG,

Civil Action No.: 08cv01469(VM)

Plaintiff.

-against-

NEW ENGLAND MOTOR FREIGHT,  
INC. & AUDRAY HEMRAJ,

Defendants.

PARTIES' JOINT DISCOVERY PLAN

Plaintiff and Defendants, through their respective undersigned counsel, hereby submit for the Court's consideration, pursuant to F.R.C.P 26(f), the following joint discovery plan:

1. Automatic Disclosures: Waived
2. Demands and Interrogatories: Served no later than April 25, 2008, with limits for same as set forth in Federal Rules of Civil Procedure, and as modified by the Local Rules for the Southern District of New York. *Service of additional interrogatories may then follow.*
3. Responses and Answers to Demands and Interrogatories: Served no later than May 28, 2008.
4. Party Depositions: Plaintiff's deposition to take place no later than July 14, 2008. Depositions of defendant Andre Hemraj and a representative for New England Motor Freight, Inc. to take place no later than July 28, 2008.
5. Non-Party Depositions: Subpoenas to issue no later than September 8, 2008.
6. Medical Examinations: Plaintiff to appear for defense medical examinations with medical professionals of defendants' choosing no later than September 8, 2008.

7. Plaintiff's Expert Disclosure: To be served on liability and damages no later than September 8, 2008.

8. Defendants' Expert Disclosure: To be served on liability and damages no later than October 30, 2008.

9. Expert Depositions: To be completed no later than January 9, 2009.

10. Privilege Issues: Privileged documentation shall not be produced. Parties may redact privileged information. Parties to produce privilege logs as required by the rules.

11. Discovery Disputes: To be addressed in accordance with Judge Freeman's Local Rules.  
12. <sup>An</sup> Any Motions to amend the pleadings or join additional parties to be served and filed no later than June 30, 2008.

Dated: Lake Success, New York  
April 9, 2008

Abrams, Fensterman, Fensterman, Eisman,  
Greenberg, Formato & Einiger, LLP

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Attorneys for Defendants  
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AND ANDRE HEMRAJ (improperly sued herein  
as AUDRAY HEMRAJ)  
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SO ORDERED: 4/9/08

  
Magistrate Judge Debra Freeman, USMJ